

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ROSE ANN PAGUIRIGAN, individually and
on behalf of all others similarly situated, :

Plaintiff, : 1:17 Civ. 1302 (NG) (CLP)

-vs- : **NOTICE OF MOTION**

PROMPT NURSING EMPLOYMENT AGENCY :
LLC d/b/a SENTOSA SERVICES, :
SENTOSACARE LLC, SENTOSA NURSING :
RECRUITMENT AGENCY, BENJAMIN LANDA, :
BENT PHILIPSON, BERISH RUBENSTEIN a/k/a :
BARRY RUBENSTEIN, FRANCIS LUYUN, :
GOLDEN GATE REHABILITATION & HEALTH :
CARE CENTER LLC, and SPRING CREEK :
REHABILITATION AND NURSING CENTER, :

Defendants. :

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PLEASE TAKE NOTICE that, upon the annexed Declaration of John J.P. Howley, the exhibits annexed thereto, the accompanying memorandum of law, and all prior proceedings had herein, Plaintiff Rose Ann Paguirigan and Defendants Prompt Nursing Employment Agency LLC d/b/a/ Sentosa Services, SentosaCare LLC, Sentosa Nursing Recruitment Agency, Benjamin Landa, Bent Philipson, Berish Rubenstein a/k/a Barry Rubenstein, Francris Luyun, Golden Gate Rehabilitation & Health Care Center LLC, and Spring Creek Rehabilitation and Nursing Center will jointly move this Court, at a date and time set at the Court's earliest convenience, for an Order granting preliminary approval of a settlement of this class action, approval of the Notice of Settlement to class members, and such other relief as the Court deems

just and proper.

Dated: New York, New York
October 4, 2021

The Howley Law Firm P.C

/s John J.P. Howley

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